

THE URBAN LAW FIRM

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

TRUSTEES OF THE NEVADA RESORT
ASSOCIATION—INTERNATIONAL
ALLIANCE OF THEATRICAL STAGE
EMPLOYEES AND MOVING PICTURE
MACHINE OPERATORS OF THE UNITED
STATES AND CANADA, LOCAL 720,
PENSION TRUST; TRUSTEES OF THE
NEVADA RESORT ASSOCIATION—
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES AND
MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA, LOCAL 720, WAGE
DISABILITY TRUST; and TRUSTEES OF
THE NEVADA RESORT ASSOCIATION—
INTERNATIONAL ALLIANCE OF
THEATRICAL STAGE EMPLOYEES AND
MOVING PICTURE MACHINE
OPERATORS OF THE UNITED STATES
AND CANADA, LOCAL 720,
APPRENTICE AND JOURNEYMAN
TRAINING AND EDUCATION TRUST,

Plaintiffs,

vs.

DESERT PALACE, LLC d/b/a CAESAR'S
PALACE, a Nevada limited-liability
company; HLV CERP MANAGER, LLC, a
Nevada limited-liability company,
HARRAH'S LAS VEGAS, LLC d/b/a
HARRAH'S CASINO HOTEL, LAS
VEGAS, a Nevada limited-liability company,
BALLY'S LAS VEGAS MANAGER, LLC, a
foreign limited-liability company,

CASE NO: 2:18-cv-01557-GMN-VCF

**STIPULATION TO EXTEND TIME FOR
ANSWER OF TO OTHERWISE PLEAD**

(SECOND REQUEST)

1 PARBALL NEWCO, LLC d/b/a BALLY'S
2 LAS VEGAS, a foreign limited-liability
3 company, FLAMINGO CERP MANAGER,
4 LLC, a Nevada limited-liability company,
5 FLAMINGO LAS VEGAS OPERATING
6 COMPANY, LLC d/b/a FLAMINGO LAS
7 VEGAS, a Nevada limited-liability company,
8 PARIS CERP MANAGER, LLC, a Nevada
9 limited-liability company, PARIS LAS
10 VEGAS OPERATING COMPANY, LLC
11 d/b/a PARIS LAS VEGAS, a Nevada limited-
12 liability company,

13 Defendant.

14 Plaintiffs, TRUSTEES OF THE NEVADA RESORT ASSOCIATION—
15 INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND MOVING
16 PICTURE MACHINE OPERATORS OF THE UNITED STATES AND CANADA, LOCAL 720,
17 PENSION TRUST; TRUSTEES OF THE NEVADA RESORT ASSOCIATION—
18 INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND MOVING
19 PICTURE MACHINE OPERATORS OF THE UNITED STATES AND CANADA, LOCAL 720,
20 WAGE DISABILITY TRUST; and TRUSTEES OF THE NEVADA RESORT ASSOCIATION—
21 INTERNATIONAL ALLIANCE OF THEATRICAL STAGE EMPLOYEES AND MOVING
22 PICTURE MACHINE OPERATORS OF THE UNITED STATES AND CANADA, LOCAL 720,
23 APPRENTICE AND JOURNEYMAN TRAINING AND EDUCATION TRUST, by and through
24 their counsel of record, The Urban Law Firm and Defendants, DESERT PALACE, LLC d/b/a
25 CAESAR'S PALACE, a Nevada limited-liability company; HLV CERP MANAGER, LLC, a
26 Nevada limited-liability company, HARRAH'S LAS VEGAS, LLC d/b/a HARRAH'S CASINO
27 HOTEL, LAS VEGAS, a Nevada limited-liability company, BALLY'S LAS VEGAS
28 MANAGER, LLC, a foreign limited-liability company, PARBALL NEWCO, LLC d/b/a
BALLY'S LAS VEGAS, a foreign limited-liability company, FLAMINGO CERP MANAGER,
LLC, a Nevada limited-liability company, FLAMINGO LAS VEGAS OPERATING COMPANY,
LLC d/b/a FLAMINGO LAS VEGAS, a Nevada limited-liability company, PARIS CERP
MANAGER, LLC, a Nevada limited-liability company, PARIS LAS VEGAS OPERATING

1 COMPANY, LLC d/b/a PARIS LAS VEGAS, a Nevada limited-liability company, by and through
2 their counsel, Greenberg Traurig, hereby agree and stipulate as follows:

3 1. The Defendants' current date to file its answer or other pleading in response to
4 Plaintiffs' Complaint is October 19, 2018.

5 2. The Plaintiffs have agreed, if approved by this Court, to extend the time for the
6 Defendants' to answer or otherwise plead until November 2, 2018.

7 3. This extension is the second stipulation to extend Defendants' time to answer or
8 otherwise plead.

9 4. The parties have reached a settlement in principal.

10 5. The parties request that the Court approve this extension to allow the parties time to
11 complete settlement documentation.

12 6. The parties and their counsel are filing this stipulation to extend in good faith and
13 not for any improper purpose or to unduly delay these proceedings.

14 Dated: October 19, 2018.

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18 By: /s/ Nathan R. Ring
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23 *Counsel for Plaintiffs*

/s/ Michael R. Hogue
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Counsel for Defendants

24 IT IS SO ORDERED



25 UNITED STATES MAGISTRATE JUDGE

26 DATED: 10-19-2018